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*Attorneys for Plaintiff
Goyard St-Honore*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GOYARD ST-HONORE, a French Corporation,

Plaintiff,

V.

S2, INC., a Delaware Corporation; SURGEON WORLDWIDE INC., a Delaware Corporation; DOMINIC CHAMBRONE aka DOMINIC CIAMBRONE, an individual; and DOES 1-10, inclusive,

Defendants.

Case No. 2:24-cv-04903-RGK-MRW

NOTICE OF SETTLEMENT AND REQUEST TO VACATE UPCOMING DEADLINES

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that plaintiff Goyard St-Honore's ("Plaintiff" or "Goyard") and defendants S2, Inc., Surgeon Worldwide Inc., and Dominic Chambrone's ("Defendants"), have come to an agreement to settle the instant action with regard to all claims alleged against Defendants. The Parties have begun discussing an initial draft of a confidential settlement agreement. The Parties anticipate that a settlement agreement will be finalized and a dismissal will be filed within 30 days. The Parties therefore request that the Court vacate all upcoming deadlines and hearings until

1 the Parties desire to reopen the action should it become necessary or until the dismissal
2 is filed.

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4 Dated: December 20, 2024

BLAKELY LAW GROUP

5 By: /s/ Tara A. Currie
6 Brent H. Blakely
7 Tara A. Currie
Attorneys for Plaintiff
Goyard St-Honore

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9 Dated: December 20, 2024

RUTAN & TUCKER, LLP

10 By: /s/ Meredith L. Williams
11 Michael D. Adams
12 Meredith L. Williams
13 *Attorneys for Defendants*
Surgeon Worldwide Inc.; and
Dominic Chambrone aka
Dominic Ciambrone

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15 **ATTESTATION RE ELECTRONIC SIGNATURES**

16 I attest that all other signatories listed, and on whose behalf the filing is
17 submitted, concur in the filing's content, and have authorized the filing.

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19 Dated: December 20, 2024

By: /s/ Tara A. Currie
Tara A. Currie

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